

PL Sum. J.

Ex. 030



Transcript of Andrew Alexander

Monday, June 27, 2022

W.K. v. Red Roof Inns, Inc

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Reference Number: 115938

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

3

4 CASE NO.: 1:20-cv-5263-MHC

5 W.K., E.H., M.M., R.P.,
M.B., D.P., A.F., C.A.,
6 R.K., K.P., and T.H.,

7 Plaintiffs,

8 vs.

9 RED ROOF INNS, INC., FMW RRI NC,
LLC, RED ROOF FRANCHISING, LLC,
10 RRI WEST MANAGEMENT, LLC,
VARAHI HOTEL, LLC, WESTMONT
11 HOSPITALITY GROUP, INC., and RRI
III, LLC,

12 Defendants.

13

14 VIDEOTAPED

15 DEPOSITION OF: ANDREW ALEXANDER

16 DATE: MONDAY, JUNE 27, 2022

17 TIME: 9:53 A.M. - 6:00 P.M.

18 PLACE: LEWIS, BRISBOIS, BISGAARD & SMITH, LLP
401 EAST JACKSON STREET, SUITE 3400
19 TAMPA, FLORIDA

20 STENOGRAPHICALLY
REPORTED BY: LINDY ROMANOFF, COURT REPORTER

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22

23

24

25

1 A P P E A R A N C E S :

2 DENISE HOYING
3 OF: Law & Moran, Attorneys at Law
563 Spring Street NW
Atlanta, GA 30308
(844)317-5460
APPEARING ON BEHALF OF THE PLAINTIFFS

5 TIANA S. MYKKELTVEDT
6 OF: BONDURANT, MIXSON & ELMORE, LLP
1201 West Peachtree Street N.W., Suite 3900
7 Atlanta, Georgia 30309
(404)881-4100 FAX-(404)881-4111
8 mykkeltvedt@bmelaw.com
APPEARING ON BEHALF OF THE PLAINTIFFS

9 JONATHAN S. TONGE
10 OF: ANDERSEN, TATE, AND CARR, P.C.
One Sugarloaf Centre
11 1960 Satellite Boulevard, Suite 4000
Duluth, Georgia 30097
12 (770)822-0900 FAX-(770)822-9680
jtonge@atclawfirm.com
13 APPEARING ON BEHALF OF THE PLAINTIFFS

14 ADI ALLUSHI
15 OF: Lewis Brisbois Bisgaard & Smith, LLP
600 Peachtree Street NE, Suite 4700
Atlanta, GA 30308
16 (404)991-2173 FAX-(404)467-8845
adi.allushi@lewisbrisbois.com
17 APPEARING ON BEHALF OF THE DEFENDANTS

18 CHRISTIAN NOVAY
19 OF: Lewis Brisbois Bisgaard & Smith, LLP
550 West Adams Street, Suite 300
Chicago, IL 60661
20 (312)463-3428 FAX-(312)345-1778
christian.Novay@lewisbrisbois.com
21 APPEARING ON BEHALF OF DEFENDANTS

22 C. SHANE KEITH, ESQUIRE
23 OF: Hawkins Parnell & Young, LLP
303 Peachtree Street NE, Suite 4000
Atlanta, GA, 30308
24 404.614.7464 Fax: 404.614.7500
skeith@hpylaw.com
25 APPEARING ON BEHALF OF DEFENDANTS

1 ALSO PRESENT:

2 Matt Staley, videographer

3 Nicholas Coletious

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1 for names, but who were the titles of the people who
2 were your direct reports as president of Red Roof Inn?

3 A. Obviously, that varied over time. Are you
4 looking for a particular --

5 Q. No. Just kind of generally, who are the folks
6 that reported up to you? Is it --

7 A. Chief -- chief financial officer, chief
8 marketing officer, and then executive assistant, HR --
9 the vice president -- head of HR, whatever title that
10 was at the time. Legal, general counsel, our corporate
11 counsel would report to me. Perhaps the chief -- chief
12 information officer. I guess that's what we were
13 calling him. Chief information officer.

14 Q. Chief operations officer?

15 A. Chief operations officer; although, they
16 weren't called that. They were called either executive
17 or senior vice president of operations.

18 Q. Is that about it?

19 A. That's about it.

20 Q. Okay. And I saw an article that talked about
21 that Red Roof had defaulted on its loans back in May of
22 2009 about the time you became president. So part of --
23 is it fair to say part of your rules and
24 responsibilities as president included sort of managing
25 that turnaround?

1 Q. And so you have stayed at the Buckhead
2 property?

3 A. Yes.

4 Q. Okay. How many times have you stayed overnight
5 at Buckhead? All six of those?

6 A. I don't know all six of those were overnight
7 stays. I would say four or five, probably.

8 Q. And would those stays just have been one-night
9 overnights?

10 A. I -- I don't recall if they were all one night
11 but...

12 Q. Okay. And we've learned throughout the course
13 of this case that Red Roof has sort of two buckets of
14 hotels. One are franchise hotels and one are
15 corporately owned or managed hotels; is that correct?

16 A. Okay. Yes.

17 Q. Is that now how you refer to them?

18 A. Well, I mean, yes, that's true, but there's --
19 even within -- you know, there's -- there's many ways
20 you could segment the hotels that we -- that were
21 franchised or managed, but that's a way to do it.

22 Q. Okay.

23 A. Yes.

24 Q. So we've got -- is one of the reasons that you
25 visited Buckhead more than Smyrna that -- is because

1 A. I do.

2 Q. And if we go to the back of this, it looks like
3 a Google alert that was sent to Dorraine Lallani about
4 the Woburn Red Roof Inn. Do you recall this?

5 A. I don't recall this specifically, no.

6 Q. Okay. Who is Dorraine Lallani?

7 A. Dorraine Lallani was asset manager -- asset
8 manager. Sorry.

9 MR. NOVAY: It's getting late.

10 BY MS. MYKKELVEDT:

11 Q. What assets did she manage?

12 A. She managed the -- the Red Roof corporately
13 managed assets for the ownership group.

14 MS. HOYING: I'm sorry. You said the
15 corporately managed assets?

16 THE WITNESS: Corporately managed hotels. Is
17 that helpful?

18 MS. HOYING: Yeah. No. I -- I just didn't --
19 I didn't hear you.

20 THE WITNESS: Yeah.

21 MS. HOYING: Okay. Sorry.

22 BY MS. MYKKELVEDT:

23 Q. Okay. And who is the ownership group?

24 MR. ALLUSHI: Objection.

25 THE WITNESS: These hotels had different

1 require them to replace their mattresses. There's a
2 variety of things that could happen.

3 Q. Who did you report to when you were president
4 of Red Roof?

5 MR. ALLUSHI: Objection. Asked and answered.

6 THE WITNESS: Mohamed Thowfeek.

7 BY MS. MYKKELVEDT:

8 Q. How often did you communicate with
9 Mr. Thowfeek?

10 A. Every couple weeks on the phone. Email as
11 needed.

12 Q. Is that because Mr. Thowfeek's office was not
13 in Ohio?

14 A. Correct.

15 Q. Was his office at --

16 MR. NOVAY: Felipe in Houston.

17 BY MS. MYKKELVEDT:

18 Q. At 5847 San Felipe in Houston?

19 A. It was on San Felipe in Houston. Whether
20 that's the exact address, I've lost that recollection.
21 It sounds correct.

22 Q. Okay. What was your understanding of -- of --
23 were you reporting to Mr. Thowfeek as a member of Red
24 Roof Inns, Inc.'s board of directors?

25 A. Oh, in his role?

1 A. At least, yes. Sometimes two days.

2 Q. Did Mr. Thowfeek also attend these meetings?

3 A. Rarely. Sometimes by phone.

4 Q. I notice that Ms. Lallani's email address is
5 Dorraine.lallani@WHG.com?

6 A. Uh-huh.

7 Q. Do you know what the WHG.com stands for?

8 A. Westmont Hotel Group.

9 Q. What is Westmont Hotel Group?

10 A. Westmont Hotel Group is a conglomerate -- a
11 conglomerate that has multiple companies and
12 partnerships primarily related to hotel ownership and
13 operations.

14 Q. Did you ever work for any company with the name
15 Westmont in it?

16 A. Well, other than the fact that it's called RRI
17 West Management, no.

18 Q. Okay. What is the relationship between RRI
19 West Management and the Westmont Hotel Group?

20 MR. ALLUSHI: Objection.

21 THE WITNESS: Relationship. Well, RRI West
22 Management managed hotels in which they were in a
23 partnership that included them asset managing those
24 same hotels, so the -- the hotels that were managed
25 by RRI West Management were also owned -- they were

1 MR. ALLUSHI: Objection.

2 BY MS. MYKKELVEDT:

3 Q. -- correct?

4 A. She's -- she's operating in this instance as an
5 authorized signer. I wouldn't -- and I'm not sure
6 that's exactly the same thing. She, especially in 2011,
7 was very much on -- you know, had the ability to sign,
8 because she was not traveling as much as others and was,
9 you know, available to -- to execute documents of this
10 type.

11 Q. And so it would be common for her to have done
12 that at that time period?

13 A. Yes. For -- you know, in the -- on the
14 financing documents, for example, you would see her sign
15 many of the financing documents because she was --

16 Q. Okay.

17 A. -- in town an available.

18 Q. In town in Ohio?

19 A. In Houston.

20 Q. Okay.

21 A. In Houston.

22 Q. Did that change over time?

23 A. Where she was? No. She was --

24 Q. Or her availability to sign contracts?

25 A. No.

1 CERTIFICATE OF OATH

2

3 STATE OF FLORIDA:

4 COUNTY OF MANATEE:

5

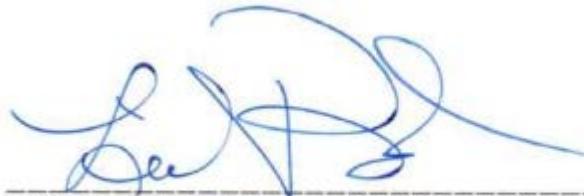
6 I, Lindy Romanoff, Notary Public, State of Florida,
7 do hereby certify that ANDREW ALEXANDER remotely
8 appeared before me on June 27, 2022 and was duly sworn
9 and produced Florida driver's license as identification.

10 Signed this 13th day of July, 2022.

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14 
15 Lindy Romanoff, Court Reporter

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Notary Public, State of Florida
My Commission No.: HH 000061
Expires: August 14, 2024

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1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA:

3 COUNTY OF MANATEE:

4

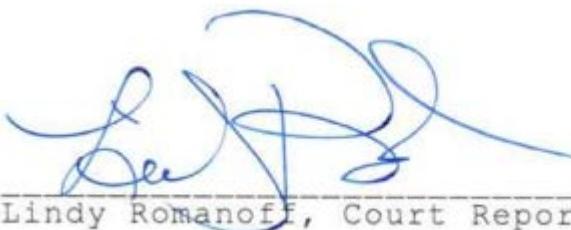
5 I, Lindy Romanoff, Notary Public, State of Florida,
6 certify that I was authorized to and did
7 stenographically report the deposition of ANDREW
8 ALEXANDER; that a review of the transcript was
9 requested; and that the foregoing transcript, pages 5
10 through 243, is a true and accurate record of my
11 stenographic notes.

12 I further certify that I am not a relative,
13 employee, or attorney, or counsel of any of the parties,
14 nor am I a relative or employee of any of the parties'
15 attorneys or counsel connected with the action, nor am I
16 financially interested in the action.

17

18 DATED this 13th day of July, 2022.

19

20 
21 _____
22 Lindy Romanoff, Court Reporter
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